

## **EXHIBIT 29**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

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MARYLAND SHALL ISSUE, INC., :  
et al., :  
: Case No:  
Plaintiffs : 16-cv-3311-MJG  
:   
-vs- : Pages 1 - 205  
:   
LAWRENCE HOGAN, in his :  
capacity of Governor of :  
Maryland, et al., :  
:   
Defendants :  
-----X

Deposition of James P. Russell, Jr.  
Baltimore, Maryland  
Monday, June 11, 2018

Reported by: Kathleen M. Vaglica, RPR, RMR  
Job No: 409351

MAGNA LEGAL SERVICES  
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1           A.    No, 'cause I get numerous requests, and it  
2   then it sends to my e-mail, which is Maryland.gov,  
3   and that's how I get responses.

4           Q.    Now, as an HQL instructor, do you charge  
5   any money?

6           A.    I do not. No, sir. I've never charged  
7   any money for any of my services that I provide,  
8   whether it be HQL, LEOSA, and/or qualification of  
9   sworn and civilian personnel.

10          Q.    All right. These 25 or 30 individuals  
11   that you have certified as instructed under the HQL,  
12   how did they come to you for instruction? How did  
13   they find you?

14          A.    Via e-mail, friends or family, you know,  
15   have contacted me in regards to it, associates of  
16   places, YMCA that I still continue to hang out, and  
17   they talk and know I'm a firearms instructor.  
18   Mostly it's just through contacts and acquaintances  
19   that I have in Cecil County.

20          Q.    And where do you hold classes for HQL  
21   instruction?

22          A.    Sure. There's three different locations

1 that I utilize, Elk Neck State Park, which is  
2 located on Eayrestown Road in Cecil County. It's a  
3 state park there.

4 Q. And they have classroom facilities there  
5 for you to use?

6 A. Classroom facilities and/or a setting  
7 where we can actually, yes, teach and do the  
8 classroom portion of it.

9 Q. Okay. Does that cost anything for you to  
10 rent?

11 A. No, sir. It's a state park, and I'll say  
12 this. Mondays the park is closed to the public, and  
13 they allow myself as a firearms instructor to use it  
14 on Mondays for those purposes.

15 Q. So --

16 A. Can I? I didn't mean to interrupt.  
17 Additionally, I use Broad Creek Range, which is the  
18 Harford County Sheriff's Office range.

19 Q. Is that open to members of the public?

20 A. No, sir. That's a closed range for the  
21 Harford County Sheriff's Office located on  
22 Flintville Road.